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Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals

Sub-Committee of Experts on the Globally Harmonized System of Classification and Labelling of Chemicals

Thirty-fifth session
Geneva, 4-6 July 2018
Item 4 (b) of the provisional agenda
Hazard communication: improvement of annexes 1 to 3 and further rationalization of precautionary statements

Proposed changes to P201 and P202

Transmitted by the expert from the United Kingdom on behalf of the working group on improving annexes 1, 2 and 3 of the GHS*

Background

1. In line with its mandate for the 2017-2018 biennium the informal working group has taken forward work under its Workstream 1: "to develop proposals to rationalise and improve the comprehensibility of hazard and precautionary statements for users, while taking into account useability for labelling practitioners."

2. This paper presents the outcome of work on item 6 in the Group's workplan (informal document INF.12/Rev.1, thirty-second session) where the issue is: "Consider merging P201 and P202 (without losing meaning)".

Discussion and proposal

3. P201, **"Obtain special instructions before use"**, and P202, **"Do not handle until all safety precautions have been read and understood"**, both aim to draw attention to the

* In accordance with the programme of work of the Sub-Committee for 2017–2018 approved by the Committee at its eighth session (see ST/SG/AC.10/C.3/100, para. 98 and ST/SG/AC.10/44, para. 14).

particular importance of safety precautions where high hazard chemicals are handled and used.

4. The hazard classes and categories where P201 and P202 apply are similar. Both apply to chemicals classified as carcinogenic, mutagenic and toxic to reproduction (CMR) (all categories). There is a condition of use for application of the CMR hazard classes/categories that P201 should be omitted where P202 is used. In addition, P201 applies to unstable explosives and P202 to chemically unstable gases A and B within the hazard class flammable gases (Table A3.2.2).

5. A footnote to Table 2.1.1 explains that "Unstable explosives are those which are thermally unstable and/or too sensitive for normal handling, transport and use. Special precautions are necessary." As they can't be transported, handling and use should only be where they are manufactured. The use of chemically unstable gases is also expected to be limited to certain industrial activities, and in some jurisdictions the use of category 1A and 1B CMR substances by the public is restricted. The implication is that the target audience for P201 and P202 is often employers/workers.

6. The existing language in both P201 and P202 is not helpful or consistent. P201 refers to obtaining special instructions before use, but not to reading/understanding these instructions and ensuring the necessary safety precautions are in place. The term "special instructions" does not appear to be used elsewhere in the GHS, and it is not immediately clear whether it refers to part of the safety data sheet, to on-site rules/operating procedures prepared by the employer, or to other instructions. On the other hand, P202 refers to reading and understanding the safety precautions, but not to applying them in practice.

7. The considerations in paragraphs 3 to 6 above point to combining the existing P201 and P202 statements to convey the message that chemicals with these particularly hazardous classifications should not be used until all the available safety information has been read and understood, and the necessary safety precautions have been put in place. The proposal, therefore, is to delete P201 and amend P202 to: **"Do not use until all available safety information is understood: follow all specified safety instructions."** The working group considered whether the second part of the phrase should be "follow all specified safety instructions and precautions". On balance their view was that there is an overlap between instructions and precautions and the shorter phrase was preferred.

8. The new combined phrase would be applied to the same hazard classes and categories as applied now to both P201 and P202. Where the new P202 is applied to consumer products, the existing condition for P103, "omit where P202 is used", ensures that only one of these precautionnary statements applies.

9. The proposed changes to combine P201 and P202, and the consequential changes elsewhere in Annex 3 are shown in informal document INF.9.

Action

10. The Sub-Committee is invited to agree the proposed changes in paragraph 7 above shown in informal document INF.9.